

Harrow Local Plan Regulation 19

Chapter 11

Representations on behalf of Taylor Wimpey Strategic Land (December 2024)

Introduction

1. On behalf of Taylor Wimpey Strategic Land ("Taylor Wimpey"), please find enclosed representations in response to the emerging Harrow Local Plan ("the Plan") Regulation 19 consultation.
2. Taylor Wimpey has an interest in all strategic and non-strategic matters informing the preparation of the Plan. These representations are made specifically in the context of Taylor Wimpey's interests in land at Pinnerwood Farm, which it has promoted through the Call for Sites process.
3. These representations relate to Chapter 11 – Site Allocations. Separate representations are made in response to the following aspects of the Plan:
 - i. Strategic Policy 03 – Meeting Harrow's Housing Needs
 - ii. Policy HO1 – Dwelling Size Mix
 - iii. Strategic Policy 06 – Social and Community Infrastructure
 - iv. Policy GI2 – Open Space

Site Selection Process

4. Table 1 of the Council's 'Site Selection / Allocation Methodology' document sets out the 'Site exclusion criteria'. Top of this table is 'Green Belt and MOL', and the justification for excluding these sites from assessment is as follows:

"Development of the Green Belt or Metropolitan Open Land would be inconsistent with the London Plan and Council's draft spatial strategy. Furthermore, it is considered that exceptional circumstances for allocation of green belt sites for development do not exist."

5. This assertion is entirely at odds with the assessment of the London Plan, with a relevant extract of the Examiners' Report¹ provided below:

*"Furthermore, the question of supply is based on capacity and given that this would be maximised as far as realistically possible **it is difficult to see how the number of deliverable housing units could be increased without consideration being given to a review of the Green Belt** or further exploration of potential with local authorities within the wider South East. This would all take time and in our view it is better to proceed on the basis of an adopted plan rather than one that is in limbo."*

(Emphasis added)

6. Paragraph 11.9a) of the Plan also outlines that sites in the Green Belt and Metropolitan Open Land were immediately excluded.

¹ Dated 8th October 2019

7. The immediate discounting of sites in the Green Belt from assessment is not justified and has skewed the site selection process. As demonstrated within the next section of these representations, this has adverse impacts with respect to the delivery of the type homes that are needed within the London Borough of Harrow in addition to the quantum (as addressed within our representations to Strategic Policy 03).
8. The Plan has not assessed the reasonable alternatives and is, therefore, not based on proportionate evidence.

Form of housing that would be delivered

9. Notwithstanding the substantial shortfall against the minimum LHN for Harrow not reflecting the identified need for family housing in setting a target of 25% of new homes to be delivered as family housing, as identified in our representations to Strategic Policy 03 and the Policy HO1, this section of these representations reviews the form of housing that would likely be delivered by the sites identified as allocations within the 'Rest of the Borough', as set out within Chapter 11 of the Plan.
10. As identified by Strategic Policy 03 of the Plan, the 'Rest of the Borough' is expected to accommodate 3,165 dwellings, 20% of the Plan's housing target (noting that this is substantially lower than the minimum housing need).
11. Strategic Policy 03 identifies that the Harrow and Wealdstone Opportunity Area is expected to accommodate 8,750 dwellings, 55% of the Plan's housing target. As demonstrated in our representations to Strategic Policy 03, this will only provide 17.5% family housing in accordance with the adopted Area Action Plan. Furthermore, 25% of the Plan's housing target is to be delivered through 'Small Sites', which in their nature are not conducive to delivering family housing and cannot be required to deliver affordable housing in accordance with the December 2023 version of the National Planning Policy Framework ("the Framework")².
12. Therefore, sites allocated in the 'Rest of the Borough' will need to make up this shortfall of family housing against the 25% target set by Policy HO1 and criterion 5B of Strategic Policy 03 as well as affordable housing against the minimum 50% target set by criterion 5A of Strategic Policy 03.
13. In this context, it is notable to have regard to the then Secretary of State for the Ministry of Housing Communities & Local Government letter to the Mayor of London dated March 2020 in relation to the Mayor's intention to publish the London Plan. Relevant extracts from this letter are set out below:

*"Everyone should have the chance to save for and buy their own home so they can have a stake in society. In the short run this requires a proactive stance in building homes for ownership, including Shared Ownership and First Homes, and in parallel delivering a consistently high level of housing supply of all tenures. You should also be looking to deliver homes which people of different ages, backgrounds and situations in life can live in. **Your Plan tilts away from this, towards one-bed flats at the expense of all else, driving people out of our capital when they want to have a family.**"*

(Emphasis added)

14. The below table details the site allocations set out within Chapter 11 of the Plan for the 'Rest of the Borough', demonstrating the densities required to deliver the level of housing being relied on by each site:

² Paragraph 65

Representations on behalf of Taylor Wimpey Strategic Land – Chapter 11 continued

Site Reference	Site Address	Site Area (ha)	Indicative Residential Capacity	Dwellings per Hectare (excluding other uses)
GB1	Royal National Orthopaedic Hospital (RNOH)	41.13	500 (Hospital, Research and innovation institutions with 347 – 500 dwellings)	12.15
O1	Waitrose South Harrow	1.57	124	78.98
O2	Roxeth Library & Clinic	0.13	15	115.38
O3	Northolt Road Nursery and Carpark	0.30	37	123.33
O4	Grange Farm	4.08	300	73.51
O7	Rayners Lane Station Carpark	0.85	69	81.17
O8	Harrow West Conservative Association	0.16	13	81.25
O9	Pinner Telephone Exchange	0.51	44	86.27
O10	Harrow View Telephone Exchange	0.28	27	96.42
O11	North Harrow Methodist Church	0.34	33	97.06
O12	Hatch End Telephone Exchange	0.38	44	115.79
O14	Vernon Lodge	0.36	56 (specialist older persons accommodation.)	155.55
O16	Travellers Rest, Kenton Road	0.69	109	157.97
O17	Kenton Road Telephone Exchange	0.08	12	150
O18	Wolstenholme Net	0.25	25	100

Site Reference	Site Address	Site Area (ha)	Indicative Residential Capacity	Dwellings per Hectare (excluding other uses)
			(specialist older person housing)	
O19	Marsh Lane Gas Holders	0.88	70	79.54
O20	Canons Park Station Carpark	0.43	26	200
O21	Anmer Lodge	1.37	141	102.91
O22	Stanmore Station Carpark	1.39	183	254.37
Average Density				113.77

15. The above demonstrates that the average density of development required to meet the housing target for the ‘Rest of the Borough’ is 113.77 dwellings per hectare. A key caveat to this is that some sites are identified to be of a lower density that would, in reality, need to be delivered as the above calculations do not factor in the other uses that are expected to be delivered – e.g. site ref. OA8 and GB1. Moreover, site GB1 is subject to a planning permission that includes 79.7% of the dwellings as flats, therefore indicating a much higher density than 12.15 dwellings per hectare.

16. The Campaign for the Protection of Rural England (now ‘The Countryside Charity’), whose goal is to maximise use of brownfield land to preserve greenfield sites, state in the executive summary of its report titled ‘Family Housing – The Power of Connection’³ that:

“Using seven case studies from around the country, this report demonstrates that good-quality, desirable family homes with gardens and communal green areas can be provided in urban areas at over 50dph, with public transport in easy walking distance of every dwelling.”

17. The average density relied upon to meet the Plan’s housing target for the ‘Rest of the Borough’ is 128% higher than this benchmark figure identified by the Countryside Charity. Therefore, this demonstrates that the housing allocations for the ‘Rest of the Borough’ would not deliver a sufficient amount of family homes to meet its own 25% requirement, let alone address the acknowledged under-delivery against the target from the Harrow and Wealdstone Opportunity Area and the highly anticipated under-delivery against from the ‘Small Sites’.

18. Moreover, the latest Annual Monitoring Report published by the London Borough of Harrow (covering the period 1st April 2017 – 31st March 2019) includes the trajectory for a list of sites that contribute towards the housing supply for the ‘Rest of the Borough’, categorised as follows:

- i. Large sites with Planning Permissions Not Started
- ii. Small Sites with Planning Permissions Not Started
- iii. Large Sites Under Construction
- iv. Small Sites Under Construction
- v. Sites with Legal Agreement (10+)

³ www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/11/Family_Housing_Report2009.pdf

- vi. Sites with Legal Agreement (small)
- vii. Allocated and Other Identified Sites (10+)
- viii. Allocated and Other Identified Sites (Small)

19. Whilst dated, this information provides the opportunity to analyse the type and size of homes being delivered by developments within the 'Rest of the Borough'. The mix of development from the sites projected to deliver dwellings from the year 2024/25 onwards (where corresponding planning permissions have been issued and can be found on the Council's online register) is set out below to provide a sample of the type of dwellings delivered through this form of development:

- i. Brockley Hill, Royal National Orthopaedic Hospital – 347 dwellings – the Planning Statement submitted in support of planning permission ref. P/3191/12 outlines that the development will comprise up to 248 apartments, up to 63 houses and 36 new worker / staff accommodation. Of the 311 private residential dwellings approved, 79.7% comprise apartment units.
- ii. Hawthorn Avenue, Churchill Hall – 37 dwellings – the planning application forms pursuant to planning permission P/1946/17 confirm that this development comprises entirely 1 and 2-bedroom properties.
- iii. Northolt Road, 190-194 – 46 dwellings – the prior approval (30 dwellings – ref. P/2623/20/PRIOR) and planning permission (16 dwellings – P/2515/21) confirm that the development of this site is for apartments (both shared and self-contained)
- iv. Vaughan Road, Vaughan Road Car Park (Regen) – 33 dwellings – planning permission P/3468/17 confirms that this development comprises solely apartment units
- v. Coverdale Close, Anmer Lodge (R4) – 120 dwellings – planning permission P/0412/14 confirms that this development comprises 114 flats (only 5 of which are more than 2 bedroom) and 6 houses.

20. In summary, based on the above, historical delivery within the Borough indicates that development allocated within the 'Rest of the Borough' would not deliver the proportion of family housing to meet the requirements of Policy HO1 (25%).

21. Further to this, research undertaken by Lichfields⁴ demonstrates that the ability to deliver family housing on brownfield sites is much more limited than on greenfield sites and, therefore, the Plan's reliance on brownfield land to meet its housing needs is not consistent with paragraph 63 of the December 2023 version of the Framework.

Summary

22. The Plan's site selection process is underpinned by the unjustified decision to exclude all Green Belt sites promoted to deliver new homes. This has, consequently, resulted in a spatial strategy that relies upon very high densities to meet the housing target set by the Plan, noting that this is substantially lower than the minimum Local Housing Need.

23. Notwithstanding that the Plan's target for 25% of new homes delivered to comprise family housing represents a substantial shortfall against the proportion of family homes needed in accordance with the Council's own evidence, the Plan's Spatial Strategy and the site-selection that has underpinned this does not facilitate meeting the 25% target.

24. It has also not demonstrated that the Spatial Strategy is conducive to meeting the 50% affordable housing requirement outlined by Strategic Policy 03, with 25% of the housing supply unable to deliver affordable homes in accordance with the December 2023 version of the Framework⁵.

⁴ <https://lichfields.uk/content/insights/banking-on-brownfield#:~:text=Further%2C%20the%20type%20of%20homes,new%20family%20homes%20with%20gardens>

⁵ Paragraph 65

25. Noting that paragraph 63 of the December 2023 version of the Framework requires the housing needs of the community to be reflected in planning policies, the Plan is unsound in accordance with paragraph 35d of the December 2023 version of the Framework. It is also unsound in accordance with paragraph 35b given that it is not justified and paragraph 35c as the target set by Strategic Policy 03 and Policy HO1 with respect to family housing cannot be delivered.

Required Modifications

26. Notwithstanding points raised within our representations to Strategic Policy 03 regarding the significantly suppressed housing target and the proportion of family homes required, if the Plan is to deliver against the 25% family homes requirement, a review of the site-selection process is required, and the Plan must allocate sites that can feasibly deliver family homes.
27. Sites of a sufficient scale that suitable densities can be achieved to deliver family homes and where meaningful amounts of affordable homes can be delivered – i.e. Green Belt sites – must be reviewed as opposed to immediately excluded, as per the approach that has been taken.

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Policy G12

Representations on behalf of Taylor Wimpey Strategic Land (December 2024)

Introduction

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2. Taylor Wimpey has an interest in all strategic and non-strategic matters informing the preparation of the Plan. These representations are made specifically in the context of Taylor Wimpey’s interests in land at Pinnerwood Farm, which it has promoted through the Call for Sites process.
3. These representations relate to Policy G12 – Open Space. Separate representations are made in response to the following aspects of the Plan:
 - I. Strategic Policy 03 – Meeting Harrow’s Housing Needs
 - II. HO1 – Dwelling Size Mix
 - III. Strategic Policy 06 – Social and Community Infrastructure
 - IV. Chapter 11 – Site Allocations

Policy G12: Open Space

4. One of the Strategic Objectives outlined in the Plan is to improve the quality of existing open space and to facilitate the provision of new open spaces, ensuring increased public access.
5. In alignment with this, criterion B of Policy G12 stipulates that major development proposals must incorporate new publicly accessible open space, unless it can be demonstrated that this is not feasible.
6. It is important to recognise that there has been no recent assessment of open space in Harrow and, therefore, the Infrastructure Delivery Plan (“IDP”) considers and summarises the findings from the Open Space PPG17 Study dated 2010.
7. In this context, it is important note that paragraph 102 of the December 2023 version of the National Planning Policy Framework emphasises that:

*“Planning policies should be based on robust **and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate”.***

(Emphasis added)

8. Given that it is clear the IDP fails to sufficiently consider the growing demand for green and open spaces resulting from the proposed population growth in the Borough.
9. However, paragraph 7.2.3 of the Plan, which supports Policy GI2, identifies specific areas of the Borough with deficiencies in accessibility to open space. These include the Belmont Local Centre, parts of the Opportunity Area between Harrow and Wealdstone, the area between Pinner and Hatch End, and around Rayners Lane. Additionally, the southern and central areas of the Borough are noted to have a deficiency in the overall quantity of open space provision.
10. In addition, paragraph 7.2.2 of the Plan highlights that although much of Harrow is relatively well served by parks and open spaces, there has been an increase in usage since the pandemic. This is evidenced by Harrow's performance in the Good Parks London rankings, which dropped from 11th out of 32 London Boroughs in 2018 to 26th out of 29 London Boroughs in 2022.
11. The IDP acknowledges that increased use of Harrow's green spaces has resulted in a negative impact on the health and biodiversity of the spaces.
12. Separate representations are made with respect to Chapter 11 of the Plan, which consider the site allocations within the 'Rest of the Borough'. A review of this and the other source of supply demonstrates that the site selection process manifests the approach set out by the Spatial Strategy to focus almost exclusively on previously developed land to meet the housing target by a minimal margin.
13. As evidence by LSE London¹ minimum open space targets are difficult to enforce and can be hard to achieve in built-up urban areas, and existing green spaces cannot sustain a rise in usage without substantial harm to their quality.
14. Notwithstanding this, as explained in our representation on Strategic Policy 03, the Spatial Strategy relies almost entirely on the high density development of brownfield land where opportunities to deliver new areas of open space are limited. Indeed, none of the site allocations identified within Chapter 11 of the Plan are identified to deliver any new playing pitches (noting that site ref. O5 includes the enhancement of existing playing fields).

Summary

15. In summary, the Plan lacks a comprehensive approach to addressing the open space deficiencies identified and fails to allocate a sufficient range of sites that are capable of delivering new, quality green spaces. The Plan's heavy reliance brownfield sites and on smaller sites, many of which cannot support the provision of adequate open space undermines its ability to meet its own strategic objectives related to public open space and community facilities.

Required Modifications

16. Criterion B of Policy GI2 requires modification to require major development to deliver new publicly accessible open space. In the event that off-site contributions are made, the policy should require the location at which the provision would be delivered to be identified. Without such a requirement, there is no certainty that the open space needs arising from development within the London Borough of Harrow would ever be met.

¹ [Protecting open space in an intensifying city: Views from built environment professionals | LSE London](#)

17. Furthermore, to deliver against the relevant Strategic Objective with respect to open space, the spatial strategy requires modification to allocate sites that are capable of delivering areas of new public open space (of the appropriate typologies to address existing shortfalls) to serve the increasing population.

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Policy HO1

Representations on behalf of Taylor Wimpey Strategic Land (December 2024)

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2. Taylor Wimpey has an interest in all strategic and non-strategic matters informing the preparation of the Plan. These representations are made specifically in the context of Taylor Wimpey’s interests in land at Pinnerwood Farm, which it has promoted through the Call for Sites process.
3. These representations relate to Policy HO1 – Dwelling Size Mix. Separate representations are made in response to the following aspects of the Plan:
 - I. Strategic Policy 03 – Meeting Harrow’s Housing Needs
 - II. Strategic Policy 06 – Social and Community Infrastructure
 - III. Policy GI2 – Open Space
 - IV. Chapter 11 – Site Allocations

Policy HO1: Dwelling size mix

4. A key Strategic Objectives for the Plan is to deliver housing of appropriate types and sizes to meet identified needs. Paragraph 1.1.7 it states:

“Promote a range of well-designed and accessible housing types and sizes, to cater for the needs of an ageing population, younger households with children, and multigenerational families.”

5. Further, criteria 1 of the Policy HO1 of the Plan states:

*“All developments for conventional residential must provide a good mix of unit sizes, to adequately address the Borough’s housing needs, **particularly for families**, as well as contribute to and support the creation of inclusive and mixed communities.”*

(Emphasis added)

6. Paragraph 63 of the December 2023 version of the National Planning Policy Framework (“the Framework”) requires that:

“Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies...”

7. The February 2024 Updated Harrow Local Housing Needs Assessment (“LHNA”)¹ prepared by the Council identifies that there is a need of 48.7% for 3-bed dwellings and 19.8% 4+ bed dwellings based on the total need of 24,266; or a need of 54.5% for 3-bed dwellings and 23.7% 4+ bed dwellings based on a total need of 16,040 homes; over the period up to 2041.

8. However, despite this evidence, Policy HO1 of the Plan only identifies a strategic target of a minimum 25% of all new dwellings to be delivered as three bed (or more) family sized dwellings across the Borough over the Plan period.

9. Paragraph 4.1.2 of the Plan states:

*“The key challenge for the Plan is to increase the delivery of family housing that generally tends to be developed at a lower density, **whilst balancing this with the requirement to meet London Plan housing targets** where a significant proportion of dwellings are assumed to be smaller dwellings.” (emphasis added)*

10. In the context of the London Plan land availability-based housing ‘targets’, as discussed in our representations in response to Strategic Policy 03, it is important to recognise that the then Secretary of State required an early review as he did not consider that the London Plan would facilitate the delivery of an appropriate amount of family housing and is *“driving people out of the capital when they want to have a family”*².

11. This formed a key part of the rationale for the then Secretary of State requiring an early review of the London Plan; a review which has yet to take place.

12. Accordingly, it has already been concluded that the London Plan does not facilitate the delivery of the size, type and tenure of housing needed in London.

13. As discussed in our representation on Strategic Policy 03, it is important to emphasise that the London Plan housing targets are based on land availability as opposed to housing need³. The December 2023 version of the Framework sets out at paragraphs 8a and 60 the requirement to ensure that sufficient land for the right types of housing is provided, as opposed to simply meeting the minimum housing requirement, and paragraph 63 states that the type of housing need should be reflected in planning policies. The Plan will be examined against these requirements to determine whether it can be found sound.

14. As outlined within our representations to Strategic Policy 03, the primary component of the Plan’s housing supply is the Harrow and Wealdstone Opportunity Area, which is expected to deliver 55% of the housing supply. The Harrow and Wealdstone Opportunity Area Action Plan (“AAP”) published in July 2013 outlines an intention for dwellings of 3-bedroom and above to be prioritised within the Wealdstone East and West sub areas; however, Chapter 5 of the AAP indicates that the target outputs from these sub areas only amounts to a combined 1,315 dwellings (17.5% of the expected delivery from the Harrow and Wealdstone Opportunity Area).

¹ Figure 4 and 5 of the Local Housing Needs Assessment 2024

² Letter from the Secretary of State dated March 2020

³ As acknowledged at paragraph 4.1.7 of the London Plan

15. Accordingly, it cannot be concluded that the Harrow and Wealdstone Opportunity Area will make a significant contribution towards delivering the substantial proportion of family housing that is evidenced to be needed in the Borough.
16. Our representations to Chapter 11 of the Plan demonstrate that the site allocations within the ‘Rest of the Borough’ rely on achieving very high densities through flatted developments on brownfield sites. This is not conducive to delivering family housing.
17. In this context, the latest Annual Monitoring Report published by the London Borough of Harrow (covering the period 1st April 2017 – 31st March 2019) includes the trajectory for a list of sites that contribute towards the housing supply for the ‘Rest of the Borough’, categorised as follows:
 - i. Large sites with Planning Permissions Not Started
 - ii. Small Sites with Planning Permissions Not Started
 - iii. Large Sites Under Construction
 - iv. Small Sites Under Construction
 - v. Sites with Legal Agreement (10+)
 - vi. Sites with Legal Agreement (small)
 - vii. Allocated and Other Identified Sites (10+)
 - viii. Allocated and Other Identified Sites (Small)
18. Whilst dated, this information provides the opportunity to analyse the type and size of homes being delivered by developments within the ‘Rest of the Borough’. The mix of development from the sites projected to deliver dwellings from the year 2024/25 onwards (where corresponding planning permissions have been issued and can be found on the Council’s online register) is set out below to provide a sample of the type of dwellings delivered through this form of development:
 - i. Brockley Hill, Royal National Orthopaedic Hospital – 347 dwellings – the Planning Statement submitted in support of planning permission ref. P/3191/12 outlines that the development will comprise up to 248 apartments, up to 63 houses and 36 new worker / staff accommodation. Of the 311 private residential dwellings approved, 79.7% comprise apartment units.
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19. In summary, based on the above, historical delivery within the Borough indicates that development allocated within the ‘Rest of the Borough’ would not deliver the proportion of family housing to meet the requirements of Policy HO1 (25%), let alone the proportion of family housing required to meet the significant needs of the London Borough of Harrow (at least 68%).
20. Turning to ‘Small Sites’ (defined by the London Plan to be sites below 0.25ha in size), such sites by their nature are not suited to delivering large numbers of family housing.

21. It is acknowledged that the London Plan sets a target for the London Borough of Harrow to deliver at least 3,750 dwellings through small sites over the period 2019/20-2028/29; however, this highlights the shortcomings of the London Plan housing target as for the London Borough of Harrow, the small site component comprises 46.75% of the total ten-year housing target for the Borough and this is not conducive to delivering the number of family homes identified to be needed by the evidence that supports the Plan (namely the updated LHNA, February 2024).
22. This is highlighted by the then Secretary of State’s letter to the Mayor of London dated March 2020 (key extracts referenced earlier in these representations) where the issue resulting from the failure to delivering family housing is outlined.

Summary

23. As evidenced by Lichfields⁴, the ability to deliver family housing on brownfield sites is much more limited than on greenfield sites.
24. In summary, the Plan does not provide an appropriate range of sites to deliver the type and size of housing needed to meet its evidenced needs and is likely to be restricted with respect to the provision of new areas of public open space and other community facilities as a consequence of focusing so heavily on the delivery of smaller sites.
25. Accordingly, the Plan does not deliver against its own Strategic Objectives.

Required Modifications

26. To comply with paragraph 63 of the December 2023 version of the Framework, criterion 1i) of Policy HO1 requires modification to reflect the identified need for family homes within the London Borough of Harrow – as set out within the Council’s own LHNA.
27. As detailed within our representations in response to other elements of the Plan, to achieve the required increase in family homes it is necessary to revisit the spatial strategy to allocate the type of sites that can deliver meaningful amounts of family homes.

⁴ <https://lichfields.uk/content/insights/banking-on-brownfield#:~:text=Further%2C%20the%20type%20of%20homes,new%20family%20homes%20with%20gardens>

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Strategic Policy 03

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Housing Requirement

Relationship with the London Plan

4. Criterion 1 of Strategic Policy 03 sets a housing requirement of 16,040 dwellings over the Plan period (2021/22 – 2040/41), with at least 8,020 dwellings delivered up to 2029. Paragraph 4.0.1 of the Plan clarifies that this requirement is derived from the London Plan housing target of 802 dwellings per annum (“dpa”), and also indicates that the Plan seeks to adopt this requirement/target for the full 20-year Plan period (i.e. up to 2041).
5. Paragraph 17b of the December 2023 version of the National Planning Policy Framework (“the Framework”) states that strategic policies can be set by a spatial development strategy produced by an elected Mayor. Indeed, paragraph 0.0.2 of the London Plan confirms that it comprises “the overall strategic plan for London” and that it “sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years”.
6. Criterion A of Policy H1 of the London Plan states that Table 4.1 of the London Plan sets the ten-year housing targets for each London Borough and that these targets should be set out within Development Plan Documents. Table 4.1 of the London Plan clearly expresses that the housing targets cover the 10-year period 2019/20 – 2028/29. Accordingly, it does not set out a housing ‘target’ for the London Borough of Harrow for the period from 2029 – i.e. the last twelve years of the Plan period.
7. The Plan states that the London Plan housing target covers the period up to 2031¹. This is fundamentally incorrect. The same paragraph of the Site Selection / Allocation Methodology document adds that the London Plan housing

¹ Paragraph 3.3

target has been ‘rolled over’ for the remainder of the Plan period. No justification has been provided to demonstrate that this is an appropriate or sound approach.

8. Furthermore, it is important to recognise that the London Plan did not meet its identified housing need at the time of its adoption. The following extracts of the London Plan Examiners’ Report² are particularly notable:

“The upshot is that the overall target is just under 523,000 homes across the 10 year period or just over 52,000 homes each year compared to 649,300 or 65,000 homes per annum in the Plan. The contribution of small sites amounts to about 12,000 per annum. This includes both modelled sites with an annual growth rate of 0.3% and other windfall sites and, in future, can be taken to be a reliable source of supply for the purposes of paragraph 70 of the 2019 NPPF as an expected future trend. This should be confirmed in the supporting text as recommended by [PR9].”

“Given the failure to meet, by some margin, the identified annual need for housing of 66,000 units we did consider during the examination in public whether this Plan should be paused for further work to be done. Alternatively, we considered whether we should determine that it does not meet the tests of soundness and so should be withdrawn. The Regulations make no provision for either eventuality but rather assume that recommendations will be contained in this report. In any event, it is evident that either course of action would lead to a considerable delay creating uncertainty and thwarting the publication of other strategic policies. There would also be a “knock-on” effect for new borough plans.”

“Furthermore, the question of supply is based on capacity and given that this would be maximised as far as realistically possible it is difficult to see how the number of deliverable housing units could be increased without consideration being given to a review of the Green Belt or further exploration of potential with local authorities within the wider South East. This would all take time and in our view, it is better to proceed on the basis of an adopted plan rather than one that is in limbo.”

“Of course, it is a major concern that the targets are so far below the assessed need. However, the evidence simply does not justify the reliance placed by the Mayor on small sites to fill the gap between the two and we are sceptical about the delivery from this source. This Plan does not provide the key to unlocking any potential. To accept the targets attributed to many of the boroughs would be setting up the Plan to fail. It is likely that some of them would be unable to demonstrate a 5 year supply of housing sites as the Housing Delivery Test would apply to individual boroughs and so result in adverse impacts. The Plan would also impose undesirable consequences on Londoners as plan-making at local level would struggle to achieve unrealistic expectations.”

(Paragraphs 174-177)

(Emphasis added)

9. It is important to recognise that the London Plan was not adopted for another 16 months following these conclusions. Therefore, it has been known for more than five years that the London Plan housing targets do not meet the identified housing need within the capital.
10. Following this, the then Secretary of State for the Ministry of Housing Communities & Local Government wrote to the Mayor of London in March 2020 in relation to the Mayor’s intention to publish the London Plan. Relevant extracts from this letter are set out below:

“Following the Planning Inspectorate’s investigation of your Plan, they only deem your Plan credible to deliver 52,000 homes a year. This is significantly below your own identified need of around 66,000 homes and well below what most commentators think is the real need of London. As I have set out, the shortfall between housing need in London and the homes your Plan delivers has significant consequences for Londoners.

Leaving tens of thousands of homes a year needed but unplanned for will exacerbate the affordability challenges within and around the capital; making renting more expensive and setting back the aspirations

² Dated 8th October 2019

of Londoners to get on the housing ladder, make tackling homelessness and rough sleeping more challenging and harm the economic success of London.

Everyone should have the chance to save for and buy their own home so they can have a stake in society. In the short run this requires a proactive stance in building homes for ownership, including Shared Ownership and First Homes, and in parallel delivering a consistently high level of housing supply of all tenures. You should also be looking to deliver homes which people of different ages, backgrounds and situations in life can live in. Your Plan tilts away from this, towards one-bed flats at the expense of all else, driving people out of our capital when they want to have a family.”

“I had expected you to set the framework for a step change in housing delivery, paving the way for further increases given the next London Plan will need to assess housing need by using the Local Housing Need methodology. This has not materialised, as you have not taken the tough choices necessary to bring enough land into the system to build the homes needed.”

“Your Plan must be brought to the minimum level I would expect to deliver the homes to start serving Londoners in the way they deserve. However, this must be the baseline and given this, I ask that you start considering the next London Plan immediately and how this will meet the higher level and broader housing needs of London.”

(Emphasis added)

11. It is, therefore, clear that the under-provision of housing in the London Plan is such that the then Secretary of State required an immediate review of the London Plan to rectify this issue. It is notable that, despite the London Plan having been adopted in March 2021, there has been no indication of a review having been commenced in the three and a half years since its adoption.
12. Accordingly, the housing targets set by the London Plan are acknowledged to fall short of the minimum housing requirement for London and, at best, only cover the period up to 2029.
13. Furthermore, it is notable that paragraph 4.1.7 of the London Plan states that: *“The ten-year housing targets in Table 4.1 are based on the 2017 SHLAA [Strategic Housing Land **Availability** Assessment]”*. Accordingly, the target is based on an assessment of land availability as opposed to the need for housing. This is an important distinction, particularly given that the land availability assumptions will not have taken into account sites that have been made available for development since the 2017 SHLAA was undertaken (including land at Pinnerwood Farm, which has only been promoted through the Plan in addition to the recent London Plan Call for Sites – October 2024).
14. Notwithstanding this, paragraph 33 of the December 2023 version of the Framework³ requires policies within local plans and spatial development strategies to be reviewed at least once every five years and updated as necessary. This is also a legislative requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012⁴ (“the Local Plan Regulations”). The London Plan was adopted in March 2021, so is due to be reviewed by March 2026 to avoid becoming out-of-date in accordance with paragraph 33 of the December 2023 version of the Framework and the Local Plan Regulations.
15. A new ‘Standard Method’ for calculating the minimum Local Housing Need (“LHN”) was published in December 2024. This identifies a minimum LHN for London of 87,992 dpa, which is an increase of 69% (or 35,992 dpa) compared to the London Plan housing target.
16. With respect to the expected approach to housing delivery in London, a letter from the current Secretary of State for Housing, Communities and Local Government to the Mayor of London dated 30th September 2024⁵ states, inter alia:

³ Paragraph 34 of the current version of the Framework

⁴ Regulation 10A

⁵ [Letter: Housing delivery in London - GOV.UK](#)

*“Our proposed new Standard Method produces an ambitious but deliverable figure for London of nearly 81,000. To achieve it, output in the capital will have to increase markedly from the current average of 37,200 homes per year (2019 to 2023). I appreciate fully the scale and breadth of the housing delivery challenge in London, and I recognise that the city faces unique issues, **but the government does expect London to take steps to boost its output.**”*

(Emphasis added)

17. It is clear that the Government is not going to accept the continued under-delivery of housing in London, facilitated by the suppressed housing requirement within the current iteration of the London Plan.
18. In light of the above, it is clear that the London Plan will become out-of-date in accordance with paragraph 33 of the December 2023 version of the Framework and the Local Plan Regulations if it is not updated to set an increased housing requirement (based on the minimum LHN) by March 2026.
19. Accordingly, it is inappropriate for the Plan to base its housing requirement / target on the London Plan housing target given that this will become out-of-date if not reviewed by March 2026. Based on the Council’s latest Local Development Scheme⁶, this would be only two months following the intended adoption of the Plan⁷, and likely prior to its adoption if the Plan is delayed in progressing through Examination.
20. Furthermore, it would be perverse for the Plan to be adopted based on an acknowledged suppressed housing target set by the London Plan when this will soon become out-of-date. Such an approach would conflict with the Government’s objective to ‘significantly’ boost the supply of housing and, accordingly, paragraph 60 of the December 2023 version of the Framework. This also renders the Plan unsound in accordance with paragraph 35d of the December 2023 version of the Framework.
21. Notwithstanding the above, paragraph 78c of the current version of the Framework identifies that from July 2026 a 20% buffer would be applied to the housing land supply requirement for authorities where the average annual housing requirement is 80% of less than the most up-to-date LHN. Therefore, even if the Plan was adopted (despite the fundamental soundness failings identified within our representations) the Council would be required to, in essence, demonstrate a 6-year housing land supply from July 2026. Accordingly, it is likely that the Plan would become out-of-date very swiftly following its adoption based on the trajectory set out under paragraph 11.22 of the Plan⁸.

LHN for the London Borough of Harrow and the Plan’s Evidence Base

22. The minimum LHN for the London Borough of Harrow, as derived by the Standard Method, is 2,294 dpa. This is 186%, or 1,492 dpa, higher than the London Plan housing target of 802 dpa. The Plan’s housing requirement / target is 29,840 dwellings below the minimum LHN for the Borough⁹ over its 20-year period. This represents a very substantial and severe shortfall.
23. The Plan is supported by an Integrated Impacts Assessment (“the IIA”), which includes a Sustainability Appraisal of the Plan.
24. With respect to housing delivery, the IIA identifies the following alternative approaches in addition to the chosen spatial strategy identified by Strategic Policy 03¹⁰:

⁶ February 2023

⁷ December 2025

⁸ The projected supply of 4,527 for the period 26/27 - 30/31 would be 285 dwellings short of the five year (plus 20% buffer) requirement for this period

⁹ 45,880 dwellings

¹⁰ Pages 59 and 60 of the IIA

- i. Retain the spatial strategy from the adopted Core Strategy (adopted 2012) – 6,050 dwellings across the Plan period (302 dpa)
 - ii. Enable the accommodation of a higher level of growth – 24,266 dwellings across the Plan period (1,213 dpa)
25. Even the ‘higher growth’ figure is substantially lower than the minimum LHN for the Borough – a shortfall of 21,614 dwellings (1,035 dpa).
26. The reasonable alternatives identified with respect to Strategic Policy 03 within the IIA¹¹ are:
 - i. High Housing Growth – 24,266 dwellings
 - ii. Low Housing Growth – Stepped trajectory over a 15-year period (12,829 dwellings in total (641 dpa over the Plan period)
27. Accordingly, the Plan is not supported by evidence assessing the implications of delivering a level of housing anywhere close to the minimum LHN. Given the requirements of paragraphs 60 and 61 of the December 2023 version of the Framework, the Plan cannot be concluded to be based on proportionate evidence and is, therefore, unsound in accordance with paragraph 35b of the December 2023 version of the Framework.
28. In assessing the implications of delivering the ‘high’ housing growth alternative with respect to Strategic Policy 03, the IIA states that *“a higher quantum of development is likely to require development on Green Belt and Metropolitan Open Land.”*
29. Whilst the Plan does not itself identify the rationale for discounting the ‘high’ housing growth alternative, the Regulation 18 consultation draft (February 2024) stated the following at paragraph 4.0.15 of that document:

*“Housing monitoring data indicates a total of 8,410 homes were delivered between 2009/10- 2020/21 (i.e. average of 841), which means it is likely to be difficult for the Borough to increase delivery of housing on previously developed sites to meet this within the existing urban area, beyond the London Plan target. **This option is likely to require the release of greenfield sites, including within the Green Belt or Metropolitan Open Land (or the potential loss of employment land) and the Local Plan evidence does not demonstrate that any exceptional circumstances exist to justify this approach.**”*

(Emphasis added)
30. No evidence is available in support of the Plan (either at Regulation 18 or 19 stages) to demonstrate that an assessment has been carried out to evaluate whether exceptional circumstances would exist to release Green Belt land. Indeed, the above statement within the Regulation 18 consultation draft of the Plan itself indicates that there is not sufficient land available within the urban area to deliver an unjustified, suppressed, housing requirement in full, let alone the minimum LHN derived via the Standard Method. This is discussed further under the ‘Spatial Strategy’ heading of these representations.
31. Table 1 of the Council’s ‘Site Selection / Allocation Methodology’ document sets out the ‘Site exclusion criteria’; top of this table is ‘Green Belt and MOL’, and the justification for this is as follows:

“Development of the Green Belt or Metropolitan Open Land would be inconsistent with the London Plan and Council’s draft spatial strategy. Furthermore, it is considered that exceptional circumstances for allocation of green belt sites for development do not exist.”
32. This assertion is entirely at odds with the assessment of the London Plan, identified earlier within these representations.

¹¹ Section 6.2.4

33. More importantly, it demonstrates that the Plan has been informed by a pre-determined decision to exclude any sites located within the Green Belt from assessment. This decision has been made in the knowledge of the Examiners of the London Plan concluding in 2019 that a review of the Green Belt is needed to meet the housing needs of London (see paragraph 8 of these representations).

Implications of not delivering the number of new homes required within the London Borough of Harrow

34. The aforementioned March 2020 letter from the then Secretary of State for the Ministry of Housing Communities & Local Government stated the following with respect to the implications of the London Plan’s suppressed housing target:

“Leaving tens of thousands of homes a year needed but unplanned for will exacerbate the affordability challenges within and around the capital; making renting more expensive and setting back the aspirations of Londoners to get on the housing ladder, make tackling homelessness and rough sleeping more challenging and harm the economic success of London.”

35. The Plan proposes to extend the suppression of housing delivery within the London Borough of Harrow for a further 15-years beyond the point when the London Plan housing targets are out-of-date in accordance with the Local Plan Regulations. As such, the Plan would result in each of the above implications.
36. With respect to affordability, the below table demonstrates the changes to house prices, median earnings and the affordability ratios within the London Borough of Harrow over the past ten-year period¹²:

Median House Price			Median Earnings			Affordability Ratios		
2013	2023	Change %	2013	2023	Change %	2013	2023	Change %
315,000	560,000	82.2	£25,784	£34,437	33.6	12.22	16.26	33.1

37. The above demonstrates that the rate of growth in the median house price has significantly outpaced the corresponding change in median earnings, the corollary of which is the worsening affordability of housing for those seeking to access the housing market within the London Borough of Harrow. An objective analysis of these metrics shows clearly that changes are required to address the incremental worsening of affordability within the Borough, with the 2023 affordability ratio representing the highest level experienced.
38. Moreover, the London Borough of Harrow has the fourth highest affordability ratio in Outer London, behind only Richmond upon Thames, Brent and Haringey¹³. The Harrow Local Economic Assessment 2019-2020 states that the London Borough of Harrow is one of the most unaffordable areas to live in the West London sub-region¹⁴.
39. The Updated Harrow Local Housing Needs Assessment (“LHNA”) 2024¹⁵ concludes that 5,527 households are currently living in unsuitable housing and are unable to afford their own housing. Of these households, 1,707 currently occupy affordable housing that does not meet the current householders’ needs, mainly due to overcrowding. Therefore, there is a net affordable housing need of 3,820 households (5,527 less 1,707 = 3,820)¹⁶. This further demonstrates the extent of the housing affordability issue within the London Borough of Harrow.

¹² ONS House price to workplace-based earnings ratio data (25th March 2024)

¹³ Based on the ONS median workplace-based affordability ratios

¹⁴ Paragraph 9.16

¹⁵ Paragraph 7 of the LHNA

¹⁶ Paragraph 8 of the LHNA

40. Further, it is notable that the existing and proposed new Standard Method includes a specific step that provides an adjustment to take account of affordability based upon the Office for National Statistics (“ONS”) affordability ratios, as outlined at paragraph ref. ID: 2a-006-20241212 of the National Planning Practice Guidance (“PPG”). Accordingly, the Government considers the level of housing delivery generally as a key component of addressing affordability issues.
41. Therefore, a continued suppression of housing delivery, as proposed by the Plan, will not only fail to address affordability within the London Borough of Housing, but contribute to this worsening.
42. Moreover, as part of Greater London, the principal urban area within England, the London Borough of Harrow will be a focus for employment over the Plan period. Indeed, the Strategic Objective titled ‘Local Economy’ under paragraph 1.1.7 of the Plan states that *“Harrow will continue to play an important role in the wider London economy, including cultural, creative and digital industries.”*
43. Based on the significant shortfall in housing delivery resulting from the Spatial Strategy, a large number of the new homes serving any employment growth would likely be located beyond the administrative boundaries of the London Borough of Harrow, and outside of Greater London itself.
44. Like many local authorities in England, the London Borough of Harrow has declared a climate emergency in response to rising carbon emissions. In this context, it is important to note that the Department for Energy Security and Net Zero published the ‘2023 UK greenhouse gas emissions, provisional figures’, on 28th March 2024¹⁷, outlines (inter alia) that transport is the largest emitting sector of greenhouse gas (herein, “GHG”) emissions and was responsible for 29.1% of the UK’s total emissions in 2023.
45. In light of this categorical evidence, the most effective means of responding positively to the climate emergency and pursuing a planning policy approach that contributes effectively to reducing carbon emissions is to ensure that new development is allocated in locations where there is the greatest potential to encourage sustainable lifestyles and reduce travel demand, which is a key contributor to GHG emissions and climate change. Failing to deliver the housing needs for the London Borough of Harrow within its boundaries could result in increased commuting distances and, as such, a failure to tackle the largest emitting sector of GHG emissions.
46. It is also notable that some local authorities within the neighbouring Hertfordshire (e.g. Three Rivers District and Dacorum Borough) are also not proposing to accommodate any unmet needs from adjoining authorities, meaning that new homes to serve the needs of the London Borough of Harrow would have to be provided a considerable distance away from where the need arises based on the suppression of housing delivery that is instigated by the Plan.

Summary of Soundness Issues with the Housing Requirement

47. The Plan does not seek to meet the minimum LHN for the London Borough of Harrow and it is not informed by agreements with other authorities to ensure that unmet needs are accommodate. Accordingly, the Plan is not Positively Prepared, as required by paragraph 35a of the December 2023 version of the Framework.
48. The Plan is not informed by an assessment of the implications of meeting the minimum LHN, or a housing requirement anywhere close to this. Therefore, the Plan is not based on proportionate evidence so it cannot be concluded to be justified, as required by paragraph 35b of the December 2023 version of the Framework.
49. The Plan disregards the Government’s objective to ‘significantly’ boost the supply of housing, as set out at paragraph 60 of the December 2023 version of the Framework. It also fails to get anywhere close to meeting the

¹⁷ [2023 UK greenhouse gas emissions, provisional figures](#)

minimum LHN for the London Borough of Harrow, thus conflicting with paragraph 61 of the December 2023 version of the Framework. On this basis, the Plan is inconsistent with the December 2023 version of the Framework and fails the soundness test outlined at paragraph 35d of the December 2023 version of the Framework.

Spatial Strategy

50. Criterion 3 of Strategic Policy 03 identifies the spatial strategy for the delivery of the Plan’s housing requirement, which is as follows:
- i. Harrow and Wealdstone Opportunity Area – 8,750 dwellings (55% of the total requirement)
 - ii. Rest of the Borough – 3,165 dwellings (20% of the total requirement)
 - iii. Small Sites – 4,125 dwellings (25% of the total requirement)
51. Table H1 of the Plan provides further information on the sources of the housing supply.
52. Notably, Table H1 indicates that surplus housing delivery from prior to the Plan period against the suppressed London Plan housing target is taken into account in identifying the housing supply. In light of the points made under the ‘Housing Requirement’ heading of these representations, it is not appropriate to include these figures within the housing supply.
53. Of the total 16,973 dwellings identified within the supply at Table H1, 8,882 dwellings are to be delivered by sites allocated by the Plan and 4,125 dwellings are assumed from the small sites windfall allowance – based on the target set by Policy H2 of the London Plan¹⁸.
54. Separate representations are made with respect to Chapter 11 of the Plan, which consider the site allocations within the ‘Rest of the Borough’. A review of this and the other sources of supply demonstrates that the site selection process manifests the approach set out by the Spatial Strategy to focus almost exclusively on previously developed land to meet the housing target by a minimal margin.
55. In this context, it is important to note that paragraph 8a of the December 2023 version of the Framework, which is concerned with delivering the economic objective of sustainable development, states that the planning system should ensure (inter alia): *“that sufficient land of the right types is available in the right places at the right time to support growth”*. This requirement is also outlined by paragraph 60 of the December 2023 version of the Framework. Paragraph 8b of the December 2023 version of the Framework, concerned with the delivering the social objective of sustainable development requires (inter alia) *“a range of homes to be provided to meet the needs of present and future generations”*.
56. Paragraph 63 of the December 2023 version of the Framework requires that planning policies reflect the size, type and tenure of housing that is needed.
57. As identified in detail within our representations to Chapter 11 of the Plan, the Plan’s site selection process has not been conducive to delivering the family and affordable housing identified to be needed within the Borough. As evidenced by Lichfields¹⁹, the ability to deliver family housing on brownfield sites is much more limited than on greenfield sites.
58. The spatial strategy is also not conducive to delivering open space and community facilities, in accordance with the relevant strategic objectives set out under paragraph 1.1.7 of the Plan. This is discussed further under the ‘Housing Needs’ section of these representations.

¹⁸ The remainder of the housing supply comprises commitments and completions

¹⁹ <https://lichfields.uk/content/insights/banking-on-brownfield#:~:text=Further%2C%20the%20type%20of%20homes,new%20family%20homes%20with%20gardens>

59. The Regulation 18 consultation draft of the Plan (February 2024) discounted delivering a higher level of housing growth on the basis of this would likely: ***“require the release of greenfield sites, including within the Green Belt or Metropolitan Open Land (or the potential loss of employment land) and the Local Plan evidence does not demonstrate that any exceptional circumstances exist to justify this approach”***²⁰ (emphasis added).
60. As demonstrated earlier in these representations, the site selection process that underpins the Plan is based on an immediate exclusion any potential housing sites on greenfield land in the Green Belt or on Metropolitan Open Land.
61. The current version of the Framework specifically identifies an inability to meet an identified need for housing without development of land within the Green Belt as an exceptional circumstance to justify the alteration of Green Belt boundaries²¹. Whilst the Plan is being examined under the transition measures outlined by the current version of the Framework, this point of clarification is a material consideration in interpreting compliance with paragraph 145 of the December 2023 version of the Framework.
62. On this basis, exceptional circumstances clearly exist to justify alterations to the Green Belt within the London Borough of Harrow.
63. Nevertheless, the Plan does not make any alterations to the Green Belt and its spatial strategy is fundamentally shaped by this decision. The primary implication of this is that the Plan falls substantially short of meeting the minimum LHN for the Borough, as discussed in the previous section of these representations. It also impacts the size, type and tenure of housing that can be delivered, as well as the ability to deliver self-build / custom build homes, conflicting with paragraph 63 of the December 2023 version of the Framework.

Size, Type and Tenure of the Housing Need

64. One of the Strategic Objectives for the Plan, under paragraph 1.1.7, is to deliver housing of appropriate types and sizes to meet identified needs. Further under the Policy HO1 of the Plan, it states (inter alia):

*“All developments for conventional residential must provide a good mix of unit sizes, to adequately address the Borough’s housing needs, **particularly for families**, as well as contribute to and support the creation of inclusive and mixed communities.”*

(Emphasis added)

65. With regard to housing size and tenure, the February 2024 Updated LHNA²² identified that there is a need of 48.7% for 3-bed dwellings and 19.8% 4+ bed dwellings based on the total need of 24,266; or a need of 54.5% for 3-bed dwellings and 23.7% 4+ bed dwellings based on a total need of 16,040 homes; over the period up to 2041.
66. However, despite this evidence, Policy HO1 of the Plan only identifies a strategic target of a minimum 25% of all new dwellings to be delivered as three bed (or more) family sized dwellings across the Borough over the Plan period.
67. Paragraph 4.1.2 of the Plan states:

*“The key challenge for the Plan is to increase the delivery of family housing that generally tends to be developed at a lower density, **whilst balancing this with the requirement to meet London Plan housing targets** where a significant proportion of dwellings are assumed to be smaller dwellings.”* (emphasis added)

²⁰ Paragraph 4.0.15 of the Regulation 18 consultation document

²¹ Paragraph 146

²² Figure 4 and 5 of the Local Housing Needs Assessment 2024

68. In the context of the London Plan land availability-based housing ‘targets’, it is important to recognise that the then Secretary of State required an early review as he did not consider that the London Plan would facilitate the delivery of an appropriate amount of family housing and is *“driving people out of the capital when they want to have a family”*²³.
69. This formed a key part of the rationale for the then Secretary of State recommending an early review of the London Plan; a review which has yet to take place.
70. Accordingly, it has already been concluded that the London Plan does not facilitate the delivery of the size, type and tenure of housing needed in London.
71. Again, it is important to emphasise that the London Plan housing targets are based on land availability as opposed to housing need²⁴. The December 2023 version of the Framework sets out at paragraphs 8a and 60 the requirement to ensure that sufficient land for the right types of housing is provided, as opposed to simply meeting the minimum housing requirement, and paragraph 63 states that the type of housing need should be reflected in planning policies. The Plan will be examined against these requirements to determine whether it can be found sound.
72. As outlined within the previous sub-section of these representations, the primary component of the Plan’s housing supply is the Harrow and Wealdstone Opportunity Area, which is expected to deliver 55% of the housing supply. The Harrow and Wealdstone Opportunity Area Action Plan (“AAP”) published in July 2013 outlines an intention for dwellings of 3-bedroom and above to be prioritised within the Wealdstone East and West sub areas; however, Chapter 5 of the AAP indicates that the target outputs from these sub areas only amounts to a combined 1,315 dwellings (17.5% of the expected delivery from the Harrow and Wealdstone Opportunity Area).
73. Accordingly, it cannot be concluded that the Harrow and Wealdstone Opportunity Area will make a significant contribution towards delivering the substantial proportion of family housing that is evidenced to be needed in the Borough.
74. Our representations to Chapter 11 of the Plan demonstrate that the site allocations within the ‘Rest of the Borough’ rely on achieving very high densities through flatted developments on brownfield sites. This is not conducive to delivering family housing.
75. In this context, the latest Annual Monitoring Report published by the London Borough of Harrow (covering the period 1st April 2017 – 31st March 2019) includes the trajectory for a list of sites that contribute towards the housing supply for the ‘Rest of the Borough’, categorised as follows:
- i. Large sites with Planning Permissions Not Started
 - ii. Small Sites with Planning Permissions Not Started
 - iii. Large Sites Under Construction
 - iv. Small Sites Under Construction
 - v. Sites with Legal Agreement (10+)
 - vi. Sites with Legal Agreement (small)
 - vii. Allocated and Other Identified Sites (10+)
 - viii. Allocated and Other Identified Sites (Small)
76. Whilst dated, this information provides the opportunity to analyse the type and size of homes being delivered by developments within the ‘Rest of the Borough’. The mix of development from the sites projected to deliver

²³ Letter from the Secretary of State dated March 2020

²⁴ As acknowledged at paragraph 4.1.7 of the London Plan

dwellings from the year 2024/25 onwards (where corresponding planning permissions have been issued and can be found on the Council’s online register) is set out below to provide a sample of the type of dwellings delivered through this form of development:

- i. Brockley Hill, Royal National Orthopaedic Hospital – 347 dwellings – the Planning Statement submitted in support of planning permission ref. P/3191/12 outlines that the development will comprise up to 248 apartments, up to 63 houses and 36 new worker / staff accommodation. Of the 311 private residential dwellings approved, 79.7% comprise apartment units.
- ii. Hawthorn Avenue, Churchill Hall – 37 dwellings – the planning application forms pursuant to planning permission P/1946/17 confirm that this development comprises entirely 1 and 2-bedroom properties.
- iii. Northolt Road, 190-194 – 46 dwellings – the prior approval (30 dwellings – ref. P/2623/20/PRIOR) and planning permission (16 dwellings – P/2515/21) confirm that the development of this site is for apartments (both shared and self-contained)
- iv. Vaughan Road, Vaughan Road Car Park (Regen) – 33 dwellings – planning permission P/3468/17 confirms that this development comprises solely apartment units
- v. Coverdale Close, Anmer Lodge (R4) – 120 dwellings – planning permission P/0412/14 confirms that this development comprises 114 flats (only 5 of which are more than 2 bedroom) and 6 houses.

77. In summary, based on the above, historical delivery within the Borough indicates that development allocated within the ‘Rest of the Borough’ would not deliver the proportion of family housing to meet the requirements of Policy HO1 (25%), let alone the proportion of family housing required to meet the significant needs of the London Borough of Harrow (at least 68%).

78. Turning to ‘Small Sites’ (defined by the London Plan to be sites below 0.25ha in size), such sites by their nature are not suited to delivering large numbers of family housing and, in accordance with the December 2023 version of the Framework²⁵, developments of less than 10 dwellings are not expected to deliver affordable housing.

79. It is acknowledged that the London Plan sets a target for the London Borough of Harrow to deliver at least 3,750 dwellings through small sites over the period 2019/20-2028/29; however, this highlights the shortcomings of the London Plan housing target as for the London Borough of Harrow, the small site component comprises 46.75% of the total ten-year housing target for the Borough and this is not conducive to delivering the number of family homes identified to be needed by the evidence that supports the Plan (namely the updated LHNA, February 2024) or affordable homes.

80. This is highlighted by the then Secretary of State’s letter to the Mayor of London dated March 2020 (key extracts referenced earlier in these representations) where the issue resulting from the failure to delivering family housing is outlined.

Summary

81. The housing requirement of the Plan is based on only meeting the London Plan housing target. This represents a substantial shortfall compared to the minimum LHN for Harrow and has always been accepted to represent a root cause of the significant suppression of housing delivery across London. Moreover, the London Plan housing targets will become out-of-date in March 2026 when the London Plan becomes five years old and were only set for the period 2019/20 – 2028/29. Accordingly, it would be perverse for the Plan to adopt the acknowledged suppressed housing target that will likely be out-of-date before the Plan is adopted.

82. It is also notable that the London Plan housing targets are, by definition, targets as opposed to requirements and that these were derived via a Strategic Housing Land **Availability** Assessment²⁶ as opposed to the housing need.

²⁵ Paragraph 65

²⁶ Paragraph 4.1.7 of the London Plan

83. Notwithstanding the above, the Spatial Strategy has been informed by a pre-determined approach of resisting the release of land from the Green Belt at all costs (despite there being clear exceptional circumstances to justify the release of land from the Green Belt) and focusing entirely on previously developed land. As demonstrated by our representations to Chapter 11 of the Plan, the corollary of this is the reliance on significant densities of development to meet the London Plan housing target in numerical terms.
84. As evidenced by Lichfields²⁷, the ability to deliver family housing on brownfield sites is much more limited than on greenfield sites. Moreover, there are challenges in delivering affordable homes on brownfield sites and the Plan is reliant on a significant amount of development (25% of the total supply) from ‘small sites’ that cannot be required to deliver affordable homes in accordance with the December 2023 version of the Framework²⁸.
85. Evidently, the Plan’s approach with respect to identifying sites and setting minimum outputs from these is based purely on meeting a quantitative figure (notwithstanding that this is substantially below the housing need for the London Borough of Harrow) and disregards the qualitative considerations that paragraphs 8a and 63 of the December 2023 version of the Framework prescribe.
86. On this basis, Strategic Policy 03 conflicts with the Strategic Objectives of the Plan itself and with the December 2023 version of the Framework. It is fundamentally unsound in accordance with paragraph 35 of the December 2023 version of the Framework.

Required Modifications

87. If Strategic Policy 03 is to be found sound, the following modifications are required:
 - i. it must identify a minimum housing requirement consistent, or greater than with minimum LHN derived via the Standard Method at the time of submission²⁹; identify an agreement with adjoining authorities to accommodate unmet and specify this within the policy; or demonstrate robustly that exceptional circumstances exist to justify an alternative approach to calculating housing need³⁰.
 - ii. criterion 5B should be updated to reflect the actual need for family housing and to identify this as the requirement.
 - iii. the spatial strategy must be updated to reflect the minimum level of housing growth required and to include a wider range of sites to deliver the size and type of homes required.

²⁷ <https://lichfields.uk/content/insights/banking-on-brownfield#:~:text=Further%2C%20the%20type%20of%20homes,new%20family%20homes%20with%20gardens>

²⁸ Paragraph 65

²⁹ Noting the provisions of the PPG – paragraph ref. ID 2a-008-20190220

³⁰ Noting the example provided at footnote 25 of the Framework

Harrow Local Plan Regulation 19

Strategic Policy 06

Representations on behalf of Taylor Wimpey Strategic Land (December 2024)

Introduction

1. On behalf of Taylor Wimpey Strategic Land (“Taylor Wimpey”), please find enclosed representations in response to the emerging Harrow Local Plan (“the Plan”) Regulation 19 consultation.
2. Taylor Wimpey has an interest in all strategic and non-strategic matters informing the preparation of the Plan. These representations are made specifically in the context of Taylor Wimpey’s interests in land at Pinnerwood Farm, which it has promoted through the Call for Sites process.
3. These representations relate to Strategic Policy 06 – Social and Community Infrastructure. Separate representations are made in response to the following aspects of the Plan:
 - I. Strategic Policy 03 – Meeting Harrow’s Housing Needs
 - II. HO1 – Dwelling Size Mix
 - III. Policy GI2 – Open Space
 - IV. Chapter 11 – Site Allocations

Strategic Policy 06: Social and Community Infrastructure

4. One of the Strategic Objectives outlined in the Plan is to ensure the provision of appropriate social and physical infrastructure to meet both current and future demand within the Borough. The objective titled ‘Infrastructure’ under paragraph 1.1.7 of the Plan states:

“Harrow’s infrastructure will continue to meet current and future demand through high quality and timely provision. Development contributions will be used to ensure that the community continue to enjoy access to all forms of social and physical infrastructure, including education, health care, recreation and cultural facilities.”

5. To achieve this Strategic Objective, criterion b of the Strategic Policy 06 requires development proposals to:

“demonstrate adequate infrastructure capacity exists or will be provided on and off site to serve the development.”

6. In this context it is important to note that paragraph 20 of the December 2023 version of the National Planning Policy Framework (“the Framework”) states that:

“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision¹ for: c) community facilities (such as health, education and cultural infrastructure).”

(Emphasis added)

7. Paragraph 97 of the December 2023 version of the Framework also requires planning policies to plan positive for the provision of community facilities, and paragraph 99 requires that a sufficient choice of school places is available to meet identified needs.
8. The London Borough of Harrow Infrastructure Delivery Plan (“IDP”) October 2024 identifies that there are significant shortfalls in primary school places, particularly within the Central Harrow area, up to 2034. The IDP also recognises a continued rise in demand for specialist provision for children with Special Educational Needs and Disabilities (SEND), indicating that additional capacity is required borough wide.
9. Although a significant level of new housing development is planned in Harrow’s Opportunity Area over the plan period (55% of the total requirement identified), the IDP acknowledges that the types of housing units, and therefore the anticipated child yield, are not known at this stage. However, it is worth noting that while the planned development of Harrow View Primary School (through site ref. OA16) is intended to provide some additional primary school places, it remains uncertain whether this will be sufficient to fully meet the projected demand and effectively address the identified educational deficiencies in this area (noting that site ref. OA16 is also allocated to deliver 2,675 dwellings and the approved school only provides 630 places²).
10. For the ‘Rest of the Borough’ element of the spatial strategy, it is acknowledged that site ref. O6 – Brethren’s Meeting Hall, the Ridgeway – is allocated to deliver a new school. The allocation is specifically for a SEND school, so would offer a specific education provision. Site ref. O5 – Harrow School Estate and John Lyon School – identifies that the site would deliver a *“Refurbishment / redevelopment of school buildings, sports facilities and enhancement of playing fields”*; however, there is no indication that this would result in an increase in school places.
11. In terms of health infrastructure, the IDP recognises that current health provision is currently experiencing significant capacity issues and existing health infrastructure is unable to support new housing developments without appropriate mitigation measures being secured. Notably, it states that *“there is a risk that further development especially in the central area of the Borough (including within the Opportunity Area) will create further pressure on GPs as the population increases and ages”*.
12. It is unclear whether the healthcare facilities required as part of some of the site allocations (some of which are on existing healthcare sites) would meet the identified needs arising from the additional population that would be generated by the planned development – noting that this is substantially lower than the minimum Local Housing Need (see our representations to Strategic Policy 03). Furthermore, allocated health provision is focused within the Harrow and Wealdstone Opportunity Area, with very limited new / enhanced provision within the rest of the Borough.
13. In addition, the IDP identifies an existing shortfall in Community Halls. With growing demand for such amenities, there is likely to be a pressing need for improved provisions in these areas to meet the expanding population’s needs. As with healthcare provisions, there are limited community uses allocated within the ‘Rest of the Borough’.

¹ In line with the presumption in favour of sustainable development

² [Approved: new primary school and new secondary school run by Harrow's existing academies - MyLondon](#)

14. In terms of sports provision, the Harrow Indoor and Outdoor Strategy 2024 -2037 identifies the need to replace or improve existing leisure and recreation facilities, additional pressures arising from a growing, ageing and changing population and the need to protect future usage and extend access to facilities where possible across the borough. The IDP acknowledges that while the London Borough of Harrow currently has some sports and leisure facilities, there may be gaps in terms of capacity, accessibility, and inclusivity.
15. However, it is crucial to highlight that the IDP itself acknowledges a significant limitation in the population projections, as the GLA 2021-based Demographic Projections do not account for the proposed site allocations, including new sites identified through the Call for Sites process for the new Local Plan, which were introduced after the projections were released. As a result, it is clear that the demand for social and physical infrastructure arising from the proposed growth is likely to be much higher than the need identified in the IDP, undermining the adequacy of the current infrastructure planning.
16. The Spatial Strategy outlined in the Plan focuses development at town centre locations, particularly the central Station Road corridor and Harrow and Wealdstone town centres.
17. Given the pressures on infrastructure in the Harrow and Wealdstone Opportunity Area, particularly in terms of education and healthcare, it is unrealistic to assume that the proposed site allocations will adequately address the growing demand for social and physical infrastructure. Instead, these developments are more likely to exacerbate existing issues and put additional strain on essential services.
18. Separate representations are made with respect to Chapter 11 of the Plan, which consider the site allocations within the 'Rest of the Borough'. A review of this and the other sources of supply demonstrates that the site selection process manifests the approach set out by the Spatial Strategy to focus almost exclusively on previously developed land to meet the housing target by a minimal margin.
19. Turning to 'Small Sites' (defined by the London Plan to be sites below 0.25ha in size), such sites by their nature are not suited to delivering any forms of social and physical infrastructure, including education, health care, recreation and cultural facilities within the site in line with the paragraph 20 of the December 2023 version of the Framework.
20. Further, representations to Chapter 11 of the Plan demonstrate that the site allocations within the 'Rest of the Borough' rely on achieving very high densities through flatted developments on brownfield sites. This approach does not provide a sufficient basis to address the growing demand for infrastructure and exacerbates the pressure on already overstretched facilities.
21. On this basis, the Spatial Strategy which primarily focuses on high-density development in town centre locations, does not align with the strategic objectives of the Local Plan, particularly in relation to delivering sufficient community infrastructure needs associated with the planned growth. As such, Strategic Policy 06 fails to support the Borough's Strategic Objectives and is inconsistent with the December 2023 version of the Framework. On this basis, it cannot be found sound.

Required Modifications

22. No modifications are required to Strategic Policy 06 itself. However, to deliver the requirements of the policy and the relevant Strategic Objective with respect to social and physical infrastructure in compliance with the paragraph 20, 97 and 99 of the December 2023 version of the Framework, the spatial strategy must be amended to allocate sites that are capable of delivering required infrastructure facilities to serve the increased population growth without exacerbating the pressure on already overstretched facilities in the Harrow and Wealdstone Opportunity Area.

23. This will require a consideration of sites currently located within the Green Belt.